

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

# UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

Eastern Division

Richard C. Craver

Case No.

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Franklin County Child Support Enforcement Agency

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT AND REQUEST FOR INJUNCTION

### I. The Parties to This Complaint

#### A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

|                    |                         |
|--------------------|-------------------------|
| Name               | Richard C. Craver       |
| Street Address     | 6886 Garden Terrace Rd. |
| City and County    | Columbus, Franklin      |
| State and Zip Code | OH 43229                |
| Telephone Number   | (614) 707-8783          |
| E-mail Address     | proctorxguru@gmail.com  |

#### B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

---

Defendant No. 1

|                                  |  |
|----------------------------------|--|
| Name                             | Franklin County Child Support Enforcement Agency |
| Job or Title <i>(if known)</i>   |  |
| Street Address                   | 80 E. Fulton St.                                 |
| City and County                  | Columbus, Franklin                               |
| State and Zip Code               | OH 43215   |
| Telephone Number                 | (614) 525-3275                                   |
| E-mail Address <i>(if known)</i> |  |

Defendant No. 2

|                                  |  |
|----------------------------------|--|
| Name                             |  |
| Job or Title <i>(if known)</i>   |  |
| Street Address                   |  |
| City and County                  |  |
| State and Zip Code               |  |
| Telephone Number                 |  |
| E-mail Address <i>(if known)</i> |  |

Defendant No. 3

|                                  |  |
|----------------------------------|--|
| Name                             |  |
| Job or Title <i>(if known)</i>   |  |
| Street Address                   |  |
| City and County                  |  |
| State and Zip Code               |  |
| Telephone Number                 |  |
| E-mail Address <i>(if known)</i> |  |

Defendant No. 4

|                                  |  |
|----------------------------------|--|
| Name                             |  |
| Job or Title <i>(if known)</i>   |  |
| Street Address                   |  |
| City and County                  |  |
| State and Zip Code               |  |
| Telephone Number                 |  |
| E-mail Address <i>(if known)</i> |  |

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

TITLE 18, U.S.C., SECTION 242- Deprivation of Rights Under Color of Law

42 U.S. Code § 1994 - Peonage Abolished

18 U.S. Code § 1589 - Forced Labor

18 U.S.C. § 1581- Involuntary Servitude

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

## 1. The Plaintiff(s)

## a. If the plaintiff is an individual

The plaintiff, *(name)* Richard Craver, is a citizen of the  
State of *(name)* Ohio.

## b. If the plaintiff is a corporation

The plaintiff, *(name)* \_\_\_\_\_, is incorporated  
under the laws of the State of *(name)* \_\_\_\_\_,  
and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

## 2. The Defendant(s)

## a. If the defendant is an individual

The defendant, *(name)* \_\_\_\_\_, is a citizen of  
the State of *(name)* \_\_\_\_\_. Or is a citizen of  
*(foreign nation)* \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) Franklin County CSEA, is incorporated under the laws of the State of (name) Ohio, and has its principal place of business in the State of (name) Ohio.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:  
\$62,838- This is the amount that has been stolen thus far and still rising. I, the plaintiff was coerced into signing a contract with the CSEA. All signatures were induced under duress.

---

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?  
Franklin County CSEA office

B. What date and approximate time did the events giving rise to your claim(s) occur?  
8-9am on the date of 1/4/2109

---



C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what?*

*Was anyone else involved? Who else saw what happened?)*

I, Richard Craver was coerced into signing a child support contract with the Franklin County CSEA. I was threatened with arrest, suspension of driver's license, seizure of property, and possible jail time if I did not agree to sign. Therefore, my signature was induced under duress. This has forced me into increased financial hardship along with being forced to work more than I normally would in order to make up for what is being taken. Upon discovery, I found out that this is a common method to coerce people to sign their agreements and that signing under duress makes a contract invalid. A recent 36- month review was held and now the payments have nearly tripled, including tacked on arrears which they refused to answer where they came from. An "agreement" was "decided" on during the time of the hearing for increased payments. However, this "agreement" was decided on under duress. I have attempted to communicate with the agency on this matter for months and they have completely refused to answer, yet continue to send letter after letter about getting more money from me. This is extortion.

---

#### IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

---

#### V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The CSEA is currently garnishing \$1300/monthly from my wages. I am seeking relief in terms of the child support order being terminated along with full reimbursement of all that was taken from my wages since the start of the order. I am also seeking additional compensation for the years of physical, mental, and financial pain I have been needlessly put through since the beginning of this entire ordeal (whatever the court deems fair). I also wish to rescind my signature from all contracts and other documents involved with the CSEA.

---

## VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 9/14/2023

Signature of Plaintiff Richard Craver  
Printed Name of Plaintiff Richard Craver

### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_  
Printed Name of Attorney \_\_\_\_\_  
Bar Number \_\_\_\_\_  
Name of Law Firm \_\_\_\_\_  
Street Address \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_